

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA

Richmond Division

UNITED STATES OF AMERICA	)	
	)	
v.	)	Criminal No. 3:22cr145
	)	
ZANTIAS TYLER,	)	
	)	
<i>Defendant.</i>	)	

STATEMENT OF FACTS

The United States and the defendant agree that the factual allegations contained in this Statement of Facts and in Count One of the Indictment are true and correct, and that the United States could have proven them beyond a reasonable doubt.

1. From as early as in or about May 2022, up to October 4, 2022, in the Eastern District of Virginia, the defendant, ZANTIAS TYLER, did knowingly possess and transport multiple machineguns, specifically, multiple devices known as “switches,” and also commonly known as “conversion switches” or “auto sears,” which are designed and intended solely and exclusively for use in converting a weapon to shoot automatically more than one shot, without manual reloading, by a single function of the trigger, in violation of Title 18, United States Code, Sections 921(a)(24), 922(o) and Title 26, United States Code, Section 5845(b).

2. In the month of June 2022, the ATF Internet Investigations Branch (IIB) identified a YouTube channel where the user of the account showcased several videos displaying “auto sears” affixed to pistols, as well as solicited viewers of the channel to purchase 3-D printed “auto sears.” An auto sear is defined as a combination of parts designed and intended for use in converting a weapon to shoot automatically more than one shot,

without manual reloading, by a single function of the trigger- in other words, a *machinegun* as defined in 26 U.S.C. § 5845. This YouTube channel was promoting the manufacture and sale of auto sears specific to “Glock-Style” firearms, commonly referred to as “switches” or “Glock switches.”

3. The ATF IIB identified the YouTube channel as “Hood Gunsmith” with a particular URL. The YouTube channel was open for public view with access to all video uploads, as well to community forum conversations associated with the channel. Review of the channel revealed videos of privately made firearms (PMFs) that claimed to be manufactured by the YouTube channel account user. Also, there were videos of “Glock Switches” that explained how they were created, functioned tested, and compatible with specific “Glock-Style” frames.

4. The YouTube account holder was determined to be the defendant, Zantias TYLER. Further investigation revealed that TYLER was receiving packages from a company which allowed customers to upload files for 3-D printing. Moreover, TYLER continued to advertise the sale of several different types of “switches,” both made of plastic and metal. Further investigation revealed that TYLER set up several PayPal accounts tied to his internet sales, where customers could pay for their purchase of the various “switches” being offered for sale.

5. On May 25, 2022, TYLER was stopped by Richmond Police officers who were investigating TYLER for carrying a concealed weapon. During the encounter, TYLER dropped his set of keys on the ground, which had attached two plastic “Glock Switches.” TYLER admitted to the officers that he know what “Glock Switches” were but denied that the items attached to his keys were in fact Glock Switches. These switches were seized by the police officers and turned over to ATF agents. The two switches were then sent to the ATF Firearms

Technology Branch laboratory and determined that they were both designed and intended for use in converting a Glock pistol into a machinegun, in violation of federal law. In fact, both switches were test fired at the ATF lab, who determined that they both functioned as designed and fired a weapon in fully automatic mode.

6. In the month of June 2022, TYLER advertised the sale of “Invisi-Switches” on his website, a more low- profile design of auto sears, and posted pictures of these items, stating that he got the pictures “from the manufacturer,” and that the items were due to be delivered soon. On June 27, 2022, Department of Homeland Security (DHS) Homeland Security Investigations (HSI) investigators identified an international parcel from China for shipment addressed to TYLER at his home address. Six metal “auto sears” were recovered from the package and then seized by HSI. The ATF Firearms Technology Branch determined that all (6) six auto sears recovered from the international parcel were designed and intended for use in converting a Glock pistol into a machine gun. In fact, one of the six switches was test fired by the ATF lab, who determined that it functioned as designed and fired a weapon in fully automatic mode.

7. On June 6, 2022, TYLER mailed a package addressed to an individual in North Carolina, but that package, for unknown reasons, could not be delivered in North Carolina, and was marked “Return to Sender.” The return address on that package was for a fictitious address in Belair, Maryland, and was seized by law enforcement in Maryland. Pursuant to a federal search warrant, the package was opened and found to contain a “Glock Switch.” This switch was sent to the ATF Firearms Technology Branch laboratory and determined that the switch was designed and intended for use in converting a Glock pistol into a machinegun, in violation of federal law. In fact, that switch was test fired at the ATF lab, who determined that it functioned as designed and fired a weapon in fully automatic mode.

8. On June 27, 2022, the ATF executed a federal search warrant at Tyler's residence and recovered, among other things, two auto-sears (aka "Glock Switches"). These switches were sent to the ATF Firearms Technology Branch laboratory and determined that they were designed and intended for use in converting a Glock pistol into a machinegun, in violation of federal law. In fact, one of those switches were test fired at the ATF lab, who determined that it functioned as designed and fired a weapon in fully automatic mode.

9. The actions taken by the defendant as described above were taken knowingly and willfully, and not by accident, or mistake. This statement of facts sets forth facts necessary to support the defendant's plea of guilty and does not necessarily relate all facts relevant to the charged offense or other persons who may have been involved in the offense.

Respectfully submitted,


JESSICA D. ABER  
UNITED STATES ATTORNEY

By:

  
Peter S. Duffey  
Assistant United States Attorney

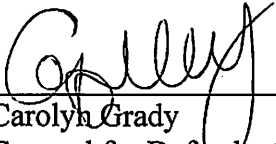
I have consulted with my attorney regarding this Statement of Facts and committed the acts described herein knowingly, intentionally, willfully and without legal justification or excuse, with the specific intent to do that which the law forbids, and not by mistake, accident, or any other reason. I knowingly and voluntarily agree that each of the above-recited facts is true and correct and that had this matter gone to trial the United States could have proven each one beyond a reasonable doubt.

Date: 11-21-22

  
Zantias Tyler  
Defendant

I am counsel for defendant, ZANTIAS TYLER. I have carefully reviewed this Statement of Facts with him and, to my knowledge, his decision to agree to this Statement of Facts is an informed and voluntary decision.

Date: 11/21/22

  
\_\_\_\_\_  
Carolyn Grady  
Counsel for Defendant